

Law Offices of Avrum J. Rosen, PLLC
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Avrum J. Rosen, Esq.
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Proposed Counsel to the Debtor and Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

FRALEG GROUP, INC.,

Case No.: 22-41410-jmm

Debtor.

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**DEBTOR’S APPLICATION FOR LEAVE TO EMPLOY THE LAW OFFICES OF
AVRUM J. ROSEN, PLLC ATTORNEYS FOR DEBTOR-IN-POSSESSION,
EFFECTIVE AS OF JUNE 17, 2022**

**TO: THE HONORABLE JIL MAZER-MARINO,
UNITED STATES BANKRUPTCY JUDGE:**

Fraleg Group, Inc., the debtor and debtor-in-possession (the “Debtor”), respectfully submits this as and for its application (the “Application”), pursuant to sections 105, 327 and 328 of Title 11, United States Code (the “Bankruptcy Code”); Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); and E.D.N.Y. Local Bankruptcy Rules, for the entry of an order, substantially the form of the proposed order annexed hereto, retaining the Law Offices of Avrum J. Rosen, PLLC (the “Firm”), as attorneys for the Debtor, effective as of June 17, 2022, and respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1408 *et seq.*

3. The statutory bases for the relief sought herein are sections 105, 327 and 328 of the Bankruptcy Code, and Bankruptcy Rule 2014.

BACKGROUND

A. Bankruptcy Filing and the Debtor's Business

4. On June 17, 2022 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

5. The Debtor continues to operate its business and manage its property as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner or committee has been appointed in this case.

6. The Debtor is a New York corporation, with its corporate office located at 931 Lincoln Place, Brooklyn, New York 11213.

7. The Debtor is a real estate investment company formed in or around 2017 and its business involves the purchase, ownership, management, rental and/or sale of real estate for profit.

B. The Firm

8. Prior to the Petition Date, the Debtor made diligent inquiry into the qualifications of the Firm, and is advised that members of the Firm are admitted to practice before this Court and by reason, ability, integrity and professional experience, are capable of providing proper legal counsel to the Debtor. The Firm has no connection with any creditor or interested party herein and represents no interest adverse to the estate or to the Debtor.

9. The Debtor is not sufficiently familiar with the rights and duties of a debtor-in-possession so as to be able to plan and conduct proceedings in Chapter 11 without the aid of competent counsel.

10. The Debtor has engaged the services of the Firm as attorneys for the Debtor and has engaged the Firm to perform services as attorneys for the debtor-in-possession subject to the approval of this Court. The Firm will advise the Debtor of the rights and duties of a debtor-in-possession, will oversee preparation of necessary reports to the courts or creditors, will conduct all appropriate investigation or litigation and will perform any other necessary duty in aid of the administration of the estate.

11. The Debtor believes that the Firm is disinterested, as that term is defined section 101(14) of the Bankruptcy Code since the Firm:

- (a) is not a creditor, equity security holder or insider;
- (b) the Debtor's shares are not publicly traded and no investment banker has been employed for the Debtor;
- (c) is not and its member has never been officers, directors or employees of the Debtor or any investment banker; and
- (d) does not have any interest materially adverse to the interest of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtor.

12. Compensation will be paid to the Firm at the customary hourly rate as counsel to the Debtor from the Debtor's estate, only upon proper application to this Court thereof. The Firm's current billing rates are as follows:

Partners:	\$625.00 per hour;
Associates:	\$325.00 - \$525.00 per hour; and
Paraprofessional:	\$100.00 - \$150.00 per hour

13. To the best of the Debtor's knowledge, the attorneys in the Firm have no connection with the Debtor, its members, or any other party in interest or their respective attorneys, except that the Firm represented another entity, IBK Partners, Inc., in its Chapter 11

Bankruptcy identified by case number 19-72940-reg, in which some of the Debtor's officers had an interest. That case was dismissed in January of 2020.

14. To the best of the Debtor's knowledge, the Firm represents no interest adverse to the Debtor or to the estate in the matter in which it is to be engaged herein, and its employment would be in the best interest of the estate.

15. The Debtor requests the Firm's retention to be effective as of the Petition Date, June 17, 2022.

NO PREVIOUS REQUEST

16. No prior motion for the relief requested herein has been made to this or any other Court.

WHEREFORE, the Debtor respectfully requests the appointment of the Law Offices of Avrum J. Rosen, PLLC as attorney for the Debtor at such compensation as this Court allows.

Dated: July 7, 2022
Brooklyn, New York

Respectfully submitted,

By: s/Andy Alege
Andy Alege
President of Fraleg Group, Inc.,